

### **Remarks**

In response to the Office Action mailed July 2, 2007, the Applicants respectfully request reconsideration of the rejections and that the application pass to issue in light of the remarks below.

Claims 29, 40, 41, 42 and 56 stand rejected under 35 U.S.C. § 102(a) as being unpatentable over *Niedzielski* (“Walk away from the wild side - European banks shield their loan portfolio from credit risk - Deutsche bank likes synthetic collateralized loan obligations” *WSJ* (Europe) July 28, 2000) (hereinafter referred to as *WSJ*). Claims 30-32, 34-37, 39, 42, 45 and 50-56 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *WSJ*. Claims 33, 44, 46-49 and 58 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *WSJ* in view of *Oldfield et al.* (Risk management in financial institutions, Fall 1997).

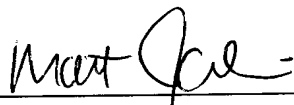
The *WSJ* reference relied on by the Examiner, is entitled to the benefit of its publication date of July 28, 2000, for purposes of 35 U.S.C. § 102(a). As factually supported in the attached Declaration, the Applicants conceived and actually reduced to practice their invention, as disclosed and claimed, prior to July 28, 2000. Accordingly, Applicants respectfully request the Examiner to withdraw the present rejections of claims 29-58.

**CONCLUSION**

For the foregoing reasons, Applicants believe that the Office Action of July 2, 2007, has been fully responded to. In view of the remarks in the attached Declaration and Exhibit A, Applicants respectfully submit that the application is in condition for allowance, which allowance is respectfully requested.

Please charge any fees or credit any overpayments as a result of the filing of this paper to Ford Global Technologies, LLC Deposit Account No. 06-1510.

Respectfully submitted,  
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